

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

MSR IMPORTS, INC.,

Plaintiff,

v.

GLOBAL GOODS, *et al.*,

Defendants.

Civil Action No. 2:23-cv-2133

FILED UNDER SEAL

**MOTION FOR 1) TEMPORARY RESTRAINING ORDER; 2) ORDER RESTRAINING
ASSETS AND MERCHANT STOREFRONTS; 3) ORDER TO SHOW CAUSE WHY A
PRELIMINARY INJUNCTION SHOULD NOT ISSUE; AND 4) ORDER
AUTHORIZING EXPEDITED DISCOVERY**

Plaintiff now moves this Court for an Order granting their *Ex Parte* Application for: 1) a temporary restraining order; 2) an order restraining assets and Merchant Storefronts (as defined *infra*); 3) an order to show cause why a preliminary injunction should not issue; and 4) an order authorizing expedited discovery against the Defendants identified on **Schedule “A”** to the Complaint (collectively, the “Defendants”). The legal support for this motion is contained in the accompanying Memorandum of Law. The evidence supporting this motion is contained in the Declarations of Jonathan Rodack, Stanley D. Ference III, Brian Samuel Malkin, and Dee Odell, and the exhibits attached thereto. A proposed order is filed herewith.

Respectfully submitted,

Dated: December 19, 2023

/s/ Stanley D. Ference III

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